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12/04/02

Deborah Lochner-Doyle
Washington State Dept. of Health
20435- 72nd Ave., S., Suite 200
Mail Stop K17-8
Kent, WA 98032

RE: Review of WAC 246.680 Prenatal Testing

Dear Ms. Lochner-Doyle:

On 10/3/02 I received your notice soliciting comments regarding the changes to the above WAC would like the following comments to be recorded at the hearing:

1. Genetic testing and prenatal risk screening procedures. I do not have any comments regarding the prenatal testing for congenital abnormalities, inherited disorders, and the various methodologies such as ultrasound for the detection of inherited or genetic abnormalities.
2. Other maternal tests. I find it odd that only hepatitis B and group B Strep are included in the amendatory section WAC 246-680010. What about the other tests, such as VDRL, HIV testing, GC and Chlamydia, Rubella, antibody titers, and glucose testing at 28 weeks, all of which are part of the "routine" maternal blood screening? I do not feel that hepatitis and group B Strep belong in this section, and should be included in a section with the others I have mentioned above, if indeed there is a WAC section pertaining to this.
3. Amendatory section WAC 246-680020. Hepatitis B is again mentioned together with group B Strep with the others excluded. I find it particularly troubling that a management protocol is outlined in this section. I do not think that documents of this nature should include management protocols. This is particularly the case in group B Strep, where the management protocols are continually changing, much of it is not based on science, and in addition it is a very legally charged issue. I would therefore like to strongly express my opinion that this whole section should be deleted, and indeed many of the recommendations are either inappropriate or incomplete.

If you have further questions. I'd be pleased to answer them. Unfortunately I will not be able to be present at the hearing.

Sincerely,

Donald Barford, M.D.
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